The request for a 90-day stay is granted.
SO ORDERED
/s/ Alvin K. Hellerstein
September 17, 2021

GEORGIA M. PESTANA *Acting Corporation Counsel*	**T**HE **C**ITY OF **N**EW **Y**ORK LAW DEPARTMENT 100 CHURCH STREET NEW YORK, NY 10007	**ANGELIQUE PESCE** *Special Assistant Corporation Counsel* Cell: (914) 649-9724

September 13, 2021

VIA ECF
Hon. J. Alvin K. Hellerstein
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *R.B. v. N.Y.C. Dep't of Educ.* 21-cv-6117 (AKH) (RWL)

Dear Judge Hellerstein:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, Georgia M. Pestana, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq*., as well as for this action.

I write to respectfully request a 90-day stay of this case, including a stay of the deadline by which Defendant must file its answer. Plaintiff consents to these requests, and has agreed to provide billing records for this matter by September 22, 2021. This is the second request for an extension of the time to answer and the first request for a stay. Defendant's first request for an extension was made on August 9, 2021 and granted by Your Honor that same day.

The requested extension would provide Defendant with sufficient time to review the billing records (once provided) with the administrative record, and obtain settlement authority from the New York City Office of the Comptroller. We are hopeful that the parties will settle this matter without the need for further burden on the Court's time.

Accordingly, Defendant respectfully requests that the action be stayed for 90 days.

Thank you for considering this request.

Respectfully submitted,

/s/
_____
Angelique Pesce

Special Assistant Corporation Counsel

cc: Irina Roller, Esq. (via ECF)